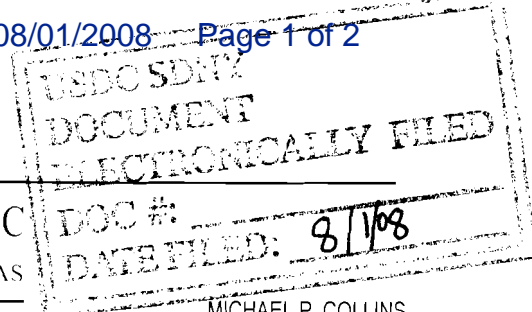




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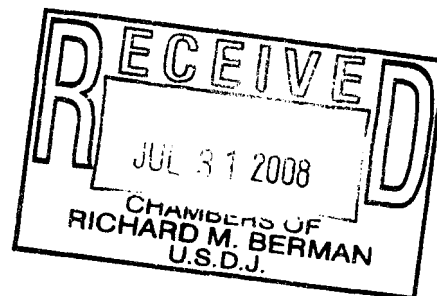
**MEMO ENDORSED**

**p. 2**

July 30, 2008

**VIA UPS OVERNIGHT MAIL**

Hon. Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 650  
New York, NY 10007



Re: *Sorrentino v. Syska Hennessy Group, Inc., et al.*; 08 CV 0287

Dear Judge Berman:

We are counsel to the defendants in the referenced action.

On June 19, 2008, at plaintiff's request and with defense counsel's consent, the Court extended fact and expert discovery until August 20, 2008.

In early July, when we received and were able to analyze the transcript of the final day of plaintiff's deposition, it became apparent to us that a mental examination was warranted based on emotional episodes plaintiff described during the deposition. We approached plaintiff's counsel and requested that the plaintiff undergo a mental examination pursuant to Fed R. Civ. P. 35, and she consented.

Thereafter, we began to search for a suitable medical expert whose schedule would permit him/her to conduct an examination and issue a report, and we identified such an expert this week. While we expect plaintiff's mental examination to be conducted prior to the August 20, 2008 discovery end date, the psychiatric expert we identified to conduct the examination has advised us the earliest he can issue a report is September 15, 2008 due to vacation plans and other scheduling conflicts.

Accordingly, we request a 45 day extension of the discovery period for the sole purpose of completing expert discovery relating to plaintiff's mental condition. This would afford

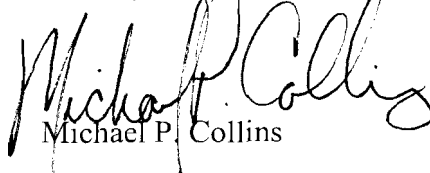
Hon. Richard M. Berman  
July 30, 2008  
Page 2

sufficient time for the examiner to issue his report and for plaintiff's counsel to depose him, if desired.

This is the first such request made by defendants. Plaintiff's counsel does not oppose the request.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

  
Michael P. Collins

MPC/di

cc (by fax): Cindy D. Salvo, Esq.

<u>Application for extension (final)</u>	
<u>granted.</u>	
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SO ORDERED:	<u>Richard M. Berman</u>
Date: <u>8/1/08</u>	Richard M. Berman, U.S.D.J.